

REMARKS/ARGUMENTS

The Applicants originally submitted Claims 1-16 in the application. In previous responses, the Applicants added Claims 17-19, amended Claims 1, 4, 7-9, 12-16 and 18, and canceled Claim 17. In the present response, the Applicants have amended Claims 4 and 14. The amendment should be considered since no new matter is added, Claim 4 is placed in a better form for consideration on appeal and Claim 14 is amended in response to a §112, second paragraph rejection that was asserted by the Examiner for the first time.

The Examiner has indicated that Claims 3-5, 9-13, 15-16 and 19 would be allowable if rewritten in independent form. The Applicants believe that all of the currently pending Claims 1-16 and 18-20 are allowable.

I. Rejection of Claims 14-16 and 18-19 under 35 U.S.C. §112

The Examiner has rejected Claims 14-16 and 18-19 under 35 U.S.C. §112, second paragraph, for being indefinite for failing to particularly point out and distinctly claim the subject matter which the applicants regard as the invention. More specifically, the Examiner rejects independent Claim 14 for failing to connect the first stage to the second stage. In response, the Applicants have amended Claim 14 to couple the first stage to the second stage. Accordingly, the Applicants respectfully request that the Examiner withdraw the §112, second paragraph, rejection and allow issuance of amended independent Claim 14 and Claims 15-16 and 18-19 that depend thereon.

II. Rejection of Claims 1-2, 6-7 and 20 under 35 U.S.C. §102

The Examiner has rejected Claims 1-2, 6-7 and 20 under 35 U.S.C. §102 as being anticipated by U.S. Patent No. 6,297,706 to Pullela. The Applicants respectfully disagree since the cited patent is not prior art.

The present application was filed on December 28, 2001, and properly claimed priority from U.S. Application No. 09/415,602 which issued as U.S. Patent No. 6,297,706 to Pullela ("Pullela"). (See page 1, first paragraph, of the present application.) Thus, even if Pullela teaches each and every element of Claims 1-2, 6-7 and 20, the common teachings of the present application and Pullela have the same priority date. Accordingly, Pullela is not §102 prior art for the present application. The Applicants, therefore, respectfully request the Examiner to withdraw the §102 rejection and allow issuance of Claims 1-2, 6-7 and 20.

III. Rejection of Claims 8, 14 and 18 under 35 U.S.C. §103

The Examiner has rejected Claims 8, 14 and 18 under 35 U.S.C. §103(a) as being unpatentable over Pullela. As argued above, the present application claims priority from Pullela. Thus, even if each element of Claims 8, 14 and 18 are taught or suggested by Pullela, the common teachings or suggestions of the present application and Pullela have the same priority date. Accordingly, Pullela can not provide a *prima facie* case of obviousness of Claims 8, 14 and 18 and does not render Claims 8, 14 and 18 unpatentable. The Applicants, therefore, respectfully request the Examiner to withdraw the §103(a) rejection and allow issuance of Claims 8, 14 and 18.

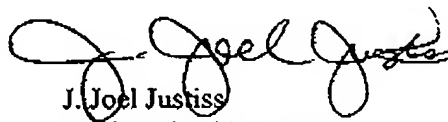
IV. Conclusion

In view of the foregoing amendment and remarks, the Applicants now see all of the Claims currently pending in this application to be in condition for allowance and therefore earnestly solicit a Notice of Allowance for Claims 1-16 and 18-20.

The Applicants request the Examiner to telephone the undersigned attorney of record at (972) 480-8800 if such would further or expedite the prosecution of the present application.

Respectfully submitted,

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